REMARKS

This amendment, submitted in response to the Office Action dated September 10, 2003, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Turning to the preliminary matters first, the Examiner has objected to the title indicating it is not descriptive. Applicant has amended the title as indicated above. Applicant requests that the Examiner approve the title. The Examiner has also objected to the Abstract. Applicant has amended the Abstract as indicated above. The Abstract should now be in proper form.

The drawings have been objected to for copy machine marks and poor line quality as indicated in the Notice of Draftperson's Patent Drawing Review. Replacement sheets are enclosed. It is believed that the drawings are now in proper form.

Turning to the merits of the Office Action, claims 1-6 are pending in the Application. The Examiner has rejected the claims under 35 U.S.C. §103(a) as being unpatentable over Gershman et al. (USP No. 6,401,085) and Hoyt et al. (USP 6,519,596).

The present invention pertains to an image data management system in which a plurality of printing stations are placed in various locations. Users can bring, for example, their digital camera, to a printing station to print desired images. At the printing station, various processes are performed on the images and the images can then be printed or transmitted. The present invention eases the management of images by storing the images in a database with their

11

attribute information, so that the images can easily be accessed at a later time through a network of printing stations.

Gershman pertains to a web-based information retrieval and display system and the management of mobile data. A PDA or a computer contains software to retrieve and display information according to the interests of a user. A user sets parameters in the program such as price, shipping, and availability of products based on what information they would like to obtain. The information is then transmitted to the user when available. See Abstract.

Based upon the foregoing description, it is apparent that Gershman does not teach the elements of the present invention.

Claim 1

The Examiner maintains Gershman teaches a plurality of printing stations with functions to read digital *image data*, to print the data by performing necessary image processing and to transmit or receive the image data. Applicant submits that Gershman has nothing to do with the image processing described in the present invention. As indicated above, Gershman describes a program which allows a user to obtain information based on a user's request. The aspects of Gershman cited by the Examiner (col. 56, line 6, lines 3-27 and col. 68, lines 18-21) describe the display of media on a user's device such as a computer or PDA and the printing of product information requested by a user. This has nothing to do with reading digital image data, printing the data by performing image processing and transmitting and receiving image data as described in claim 1.

12

The Examiner also maintains that Gershman teaches a management system connected to each printing station via a network and that the management system identifies management data of each printing station and distributes necessary data to each printing station. The Examiner cites the SM subsystem for support.

The SM Subsystem of Gershman comprises a Systems Management Server and Fault Monitoring. The Systems Management Server is a Microsoft tool that is used to distribute software content, take software audits and perform fault diagnosis. See column 57, lines 10-14. It is unclear what any of these features have to do with the management of a printing station so that information is distributed among printing stations. The aspect of Gershman cited by the Examiner pertains to the maintenance of the system itself, and not to the management of data.

The Examiner also maintains that Gershman teaches a server for turning the data being transmitted from each printing data to the management system to a database and for storing the data, citing the Reporting Interface subsystem in support. Applicant submits that the Reporting Interface subsystem is not a server as known to one of ordinary skill in the art.

The Reporting Interface subsystem gathers and logs information regarding users who access a kiosk. The purpose of gathering this information is to determine what products a user is interested in. Column 56, lines 46-58.

Assuming *arguendo* the Reporting Interface subsystem is a server, it has nothing to do with turning the data transmitted from a printing station (kiosk) to a management system (Systems Management Subsystem), to a server for storage. The Reporting Interface subsystem

13

operates only within a kiosk. See col. 56, lines 46-48. There does not appear to be a relationship between the Reporting Interface subsystem and the Systems Management Subsystem.

The Examiner concedes Gershman does not teach the *image* data being transmitted from each printing station to the management system and cites Hoyt to cure the deficiency.

Applicant submits that there would be no reason to modify Gershman to include the transmission of image data since Gershman has nothing to do with image processing. Gershman is a program that collects data according to the interests of a user and transmits that data to a user. See Abstract. The Examiner's reasoning is clearly a result of viewing the Applicant's invention.

Furthermore, modifying Gershman to include image data capabilities would require a substantial reconstruction of the system in Gershman, clearly evidencing that the Examiner's reasoning is merely a result of hindsight. MPEP 2143.01. For the above reasons, the combination of Gershman and Hoyt is not obvious and claim 1 should be deemed patentable. Claims 2-6 should be deemed patentable by virtue of their dependency to claim 1.

Claim 2

The Examiner maintains that Gershman teaches the image data turned to a database has image categories as attribute information. The Examiner's reasoning is inconsistent since Hoyt was cited for teaching image data. Since Gershman does not teach turning *image data* to a server, Gershman does not teach image categories as attribute information. Furthermore, the log information includes information regarding a users interaction with a kiosk, the output of

14

business functions the customer has invoked, and business data which the customer has input.

See col. 56, lines 50-54. There is no indication that the log information related to business

products includes image data, and the Examiner's reasoning is merely a result of hindsight upon

viewing the present invention. Therefore, claim 2 should be deemed patentable.

Claim 3

Claim 3 describes the image data turned to a database contains information for public

disclosure of the image as attribute information. The same reasoning applied above, with respect

to claim 2, also applies here. That is, the Examiner cited Hoyt, and not Gershman for teaching

image data.

Furthermore, the aspect of Gershman cited by the Examiner for teaching claim 3 (col. 47,

lines 42-51) describes the Intelligent Agent Coordinator and its functions of monitoring a user's

activities, handling a user's information requests, maintaining a user profile and routing

information to a user. All of these operations pertain to the preferences of the user in receiving

requested information, therefore, there would be no reason to turn the information for public

disclosure. Therefore, claim 3 should be deemed patentable.

Claim 5

Claim 5 describes that in the printing station, the user can specify an image to be printed

as well as an image to be transferred to and stored in the management system from the images

displayed on a monitor screen. The Examiner cites col. 56, line 17 and 46-50 for teaching these

features. The respective column and lines cited by the Examiner describe the print out of static

information as requested by a user. The information is not transferred and stored to the Systems

Management subsystem (management system cited by the Examiner). Furthermore, there is no

indication that the static information is displayed on a monitor screen. Therefore, claim 5 should

be deemed patentable.

Claim 6

Claim 6 describes that the printing station comprises a photographing equipment and a

photograph for certification purposes can be prepared. The aspect of Gershman cited for

teaching these features (col. 56, lines 5-10) describes displaying all the media such as image,

audio and video media of a system. Assuming *arguendo* the kiosk of Gershman comprises

photographing equipment, there is no indication that a photograph for certification purposes is

prepared. Therefore, claim 6 should be deemed patentable.

Finally, Applicant has added claims 7-11 to provide a more varied scope of protection.
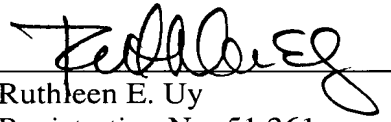
In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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17